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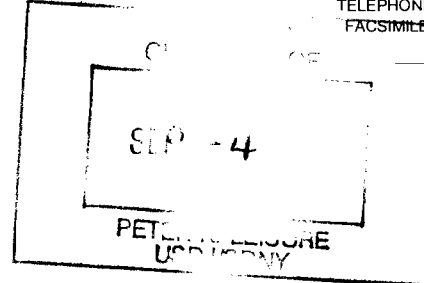
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**MEMO ENDORSED**



August 30, 2007

OUR REF: 225-07/PJG/PLS

**By Hand**

The Hon. Peter K. Leisure  
United States District Judge  
Southern District of New York  
United States Courthouse  
500 Pearl Street, Room 1910  
New York, NY 10007

Re: MUR Shipping v. Gimpro Negoce - 07 CIV 3501 (PKL)

Dear Judge Leisure:

We represent Plaintiff in the captioned matter and write to request an extension of time to serve the defendant with the Summons and Complaint for an additional 60 days. This is our first request for relief.

This matter involves a claim by Plaintiff against Defendant for breach of a maritime contract of charter party. Plaintiff's Verified Complaint included a request for an attachment pursuant to Supplemental Rule B of the Federal Rules of Civil Procedure, and contemporaneously with the filing of the Verified Complaint, Plaintiff applied for relief pursuant to Rule B, which was granted *ex parte* on May 2, 2007.

The requested Rule B attachment was granted, but the plaintiff has not yet been successful in restraining any assets of Defendant but efforts to do so are continuing. If we were to notify Defendant of these proceedings now, before any property is restrained, it would defeat the purpose for which the attachment was sought and this Court's Order issued.

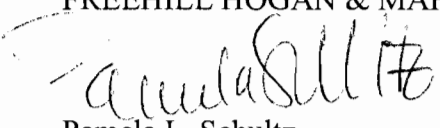
The Hon. Peter K. Leisure  
August 30, 2007  
Page 2

We therefore respectfully request that we be granted an extension of time to serve Defendant with the Complaint for a period of 60 days, up to and including, October 29, 2007. We note that Local Admiralty Rule B.2 recognizes the importance of keeping Rule B actions *ex parte* until property is actually restrained, and provides that notice of the attachment is not required to be given to the defendant until after its property has been restrained.

We thank the Court for its consideration of this request.

Respectfully submitted,

FREEHILL HOGAN & MAHAR LLP

  
Pamela L. Schultz

